

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**Case No. 10-CR-00512-MO**

**v.**

**SUPERSEDING INDICTMENT**

**ANDRE MARCELLE MILLER,**

**18 U.S.C. § 1591(a)**

**18 U.S.C. § 1591(b)(2)**

**Defendant.**

**18 U.S.C. § 2421**

**18 U.S.C. § 2423(a)**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**18 U.S.C. §§ 1591(a), 1591(b)(2)**

**(Sex Trafficking of a Child)**

On and between about October 26, 2010, and continuing until November 5, 2010, the exact dates unknown to the Grand Jury, in the Western District of Washington and District of Oregon, defendant ANDRE MARCELLE MILLER, in and affecting interstate and foreign commerce, knowingly benefitted financially and received anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained by any means, "AG," also known as "Ms. Prize," said defendant knowing and in reckless disregard that said minor had not attained the age of 18 years, and would be caused to engage in a commercial sex act; all in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(2).

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**COUNT 2**  
**18 U.S.C. § 2423(a)**  
**(Transportation with Intent to Engage in Criminal Sexual Activity)**

On or about November 5, 2010, in the District of Oregon and Western District of Washington, defendant ANDRE MARCELLE MILLER, did knowingly transport in interstate commerce, an individual who had not attained the age of 18 years, to wit: a minor known to the Grand Jury as "AG," also known as "Ms. Prize," with the intent that such minor engage in any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2423(a).

**COUNT 3**  
**18 U.S.C. § 2421**  
**(Interstate Transportation for Sexual Activity)**

On or about November 5, 2010, in the District of Oregon and Western District of Washington, defendant ANDRE MARCELLE MILLER, did knowingly transport in interstate commerce, an individual known to the Grand Jury as "AG," and "Ms. Prize," with the intent that such individual engage in any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code Section 2421.

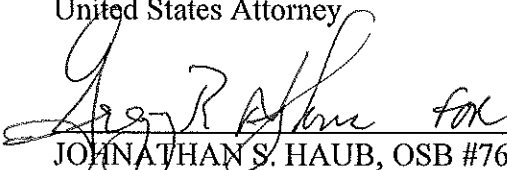
Dated this 14th day of June, 2011.

A TRUE BILL.      A

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OFFICIATING FOREPERSON

Presented by:

DWIGHT C. HOLTON  
United States Attorney

  
JOHNATHAN S. HAUB, OSB #76165  
Assistant United States Attorney